



November 17, 2020

**VIA ECF**

The Honorable Paul A. Engelmayer  
United States District Judge  
United States District Court for the Southern District of New York  
40 Foley Square, Room 2201  
New York, New York 10007

**Re: *Goldstein v. PSC*, No. 1:22-cv-00321-PAE**

Dear Judge Engelmayer:

We represent Plaintiff Avraham Goldstein in the above-captioned action. Pursuant to Rule 4.B of this Court's Individual Rules and Practices in Civil Cases, Plaintiff Avraham Goldstein respectfully requests permission to file redacted versions of certain exhibits to counsel's declarations in support of the motion for attorneys' fees and costs, filed today, that consist of attorney billing records. In accordance with the court's Rule 4.B, Plaintiff Avraham Goldstein has electronically filed a copy of the unredacted materials under seal, with the proposed redactions highlighted.

The redacted material reflects attorney-client privileged or attorney-work product descriptions of our work on this matter, including litigation strategy or communications with clients. Redaction of such material is appropriate. *See, e.g., Elliott Assocs., L.P. v. Republic of Peru*, 176 F.R.D. 93, 97 (S.D.N.Y. 1997) ("[A]ttorney invoices revealing the details of the services rendered are protected."); Order, *HomeAway.com, Inc. v. City of New York*, ECF No. 137 (Oct. 13, 2020) (granting letter motion to seal billing records related to application for attorneys' fees).

Moreover, redaction and filing under seal are especially appropriate in this matter, where all Plaintiffs, including Avraham Goldstein, have ongoing claims against the remaining Defendants, which could expose litigation strategy and privileged communications if the billing records are not redacted.

Respectfully submitted,

**s/ Nathan J. McGrath**

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cc: All counsel of record (via ECF)